



John A. Trinder
President and Chief Operating Officer

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SEP 10 2007

Federal Communications Commission
Office of the Secretary

September 5, 2007

Federal Communications Commission
445 12th Street, NW
Washington, DC 20554

Dear FCC Commissioners:

After reading the CableTV Viewability Proposal, I am writing to you in support of the proposal. This is the only way to guarantee that analog cable subscribers will not be disenfranchised after the DTV transition.

TV signals must be protected from material degradation so that consumers can reap the full benefits of HDTV.

Sincerely,

A handwritten signature in black ink, appearing to be "J. Trinder", written over a circular stamp or seal.

/dth

C: The Honorable Kevin J. Martin, Chairman (via email)
The Honorable Michael J. Copps, Commissioner (via email)
The Honorable Jonathan S. Adelstein, Commissioner (via email)
The Honorable Deborah Taylor Tate, Commissioner (via email)
The Honorable Robert M. McDowell, Commissioner (via email)
Marsha MacBride, Exec. VP, Legal & Regulatory Affairs, NAB
(via email)

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SEP 10 2007

Federal Communications Commission
Office of the Secretary

From: Matlock, Clarence [mailto:Clarence.Matlock@cableone.net]
Sent: Wednesday, September 05, 2007 3:47 PM
To: Deborah Tate
Subject: Triple DTV Carriage

September 5, 2007

Re: FCC Chairman Kevin Martin's Proposed Triple Carriage Must-Carry Order

Dear Commissioner Tate:

Members of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA) are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. These cable operators who provide service to smaller and rural markets are currently making significant investments in their facilities to offer more services to consumers, including high-definition digital programming and video on demand. In addition, these operators are launching advanced services, such as broadband and voice, providing rural consumers with the much-touted "Triple Play." Small and medium-sized cable operators understand that to remain competitive, they must offer consumers a robust service.

However, the Associations and their members are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009 to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation. The upgrade costs required to comply with this mandate are substantial -- upwards of several hundred dollars per subscriber in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for small cable operators to upgrade their facilities to all-digital and provide set-top boxes to all of their subscribers.

In some cases, the triple-carriage requirement would force operators of small systems to remove existing channels from their channel lineup, or reduce the amount of bandwidth available for broadband and voice services, further broadening the digital divide between urban and rural consumers. In other cases, operator would be compelled to shut down their systems altogether, removing a vital video and voice competitor in the market, and denying access to broadband services.

Rather than mandating triple carriage, the federal government should allow the marketplace to dictate which formats independent cable operators provide to their subscribers and the timetable for small operators to transition into all-digital services, among those that can do so. Letting the market work will ensure that consumers stay connected after the digital transition.

The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them. The Associations and their community-based members, along with the millions of subscribers they serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

Sincerely,

Clarence Matlock
418 N. Highland

Chanute, KS. 66720

From: Lester Langley [mailto:llangley@lwcpafirm.com]
Sent: Wednesday, September 05, 2007 3:37 PM
To: Deborah Tate
Subject: CableTV Viewability Proposal

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SEP 10 2007

Federal Communications Commission
Office of the Secretary

Commissioner Tate-

As a small broadcaster, I want to express our support for the Viewability Proposal to keep from disenfranchising our local analog cable subscribers after the DTV transition. This is the only way to keep viewers who only have analog sets from losing our local signals.

Thank you in advance for your support on this issue.

Lester Langley
CFO
National Communications, LLC
Blue Bonnet Communications, Inc.

Langley Williams & Company, LLC
205 W. College St.
Lake Charles, LA 70605
337-477-2827 Ext. 16 (office)
337-540-7762 (cell)
337-478-8418 (fax)
llangley@lwcpafirm.com

The opinions and conclusions contained in the memorandum are based in part on the completeness and accuracy of the above-stated facts and assumptions. If any of these facts and assumptions are not complete and accurate, please notify us immediately as we may have to materially modify the opinions and conclusions of this memorandum. We are relying upon the relevant provisions of the Internal Revenue Code of 1986, the regulations thereunder, and judicial and administrative interpretations thereof, which exist at the date of this opinion. These provisions are subject to change or modification by subsequent legislative, regulatory, administrative or judicial actions or decisions. Any such changes could have a material effect on the opinions and conclusions of this letter.

Unless specifically requested, we will not update our advice for

subsequent changes to the law and/or regulations or the judicial and administrative interpretation thereof. The use of this e-mail is strictly limited to the recipient and his authorized representatives.

IRS CIRCULAR 230 DISCLOSURE: TO ENSURE COMPLIANCE WITH REQUIREMENTS IMPOSED BY THE IRS, WE INFORM YOU THAT ANY U.S. FEDERAL TAX ADVICE CONTAINED IN THIS COMMUNICATION (INCLUDING ANY ATTACHMENTS) IS NOT INTENDED OR WRITTEN TO BE USED, AND CANNOT BE USED, FOR THE PURPOSE OF (I) AVOIDING PENALTIES UNDER THE INTERNAL REVENUE CODE OR (II) PROMOTING, MARKETING OR RECOMMENDING TO ANOTHER PARTY ANY TRANSACTION OR MATTER ADDRESSED HEREIN.

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From: Oswald, Randy [mailto:roswald@kptm.com]
Sent: Wednesday, September 05, 2007 3:31 PM
To: Deborah Tate
Subject:

SEP 10 2007

Federal Communications Commission
Office of the Secretary

Dear [Chairman Martin] or [Commissioner _____]:

I am the General Manager of Pappas Telecasting's Station _____, the _____ affiliate in _____.

I believe that it is imperative that the Commission put cable subscribers first when it adopts its DTV carriage rules next Tuesday, and am writing to express my strong support for the Commission's "viewability" proposals.

The FCC must act to ensure that cable subscribers are not disenfranchised by the switch to digital-only broadcasting in February 2009. Therefore, we support the Commission's proposal to require cable operators to choose between (a) downconverting the digital must-carry channels and

carrying both the digital and analog signals for these channels and (b) carrying the local must-carry

signals in digital only and providing the necessary equipment to ensure that all subscribers can view those

signals. The "viewability" proposal outlined above will promote Congress's goal of ensuring that the

DTV transition is completed smoothly and in a manner that benefits consumers.

We also support the Commission's pro-consumer extension of the signal degradation rules to digital carriage, and believe that the Commission's proposal in this regard will ensure that every cable customer receives the full benefits of digital television.

Many thanks for all of your efforts to ensure a smooth DTV transition for all television viewers.

Sincerely,

Randy Oswald

SEP 10 2007

Federal Communications Commission
Office of the Secretary**From:** Robin Anderson [mailto:randerson@daktel.com]**Sent:** Wednesday, September 05, 2007 12:41 PM**To:** Deborah Tate; Kevin Martin; Jonathan Adelstein; Michael Copps; Robert McDowell;
senator@dorgan.senate.gov**Subject:** FCC Chairman Kevin Martin's Proposed Triple Carriage Must-Carry Order

September 4, 2007

To the Members of the United States Senate

To the Members of the United States House of Representatives

Re: FCC Chairman Kevin Martin's Proposed Triple Carriage Must-Carry Order

Dear Senators and Representatives:

Members of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA) are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. These cable operators who provide service to smaller and rural markets are currently making significant investments in their facilities to offer more services to consumers, including high-definition digital programming and video on demand. In addition, these operators are launching advanced services, such as broadband and voice, providing rural consumers with the much-touted "Triple Play." Small and medium-sized cable operators understand that to remain competitive, they must offer consumers a robust service.

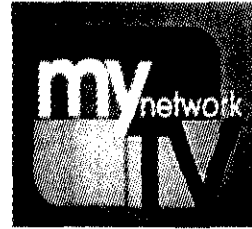
However, the Associations and their members are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009 to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation. The upgrade costs required to comply with this mandate are substantial -- upwards of several hundred dollars per subscriber in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for small cable operators to upgrade their facilities to all-digital and provide set-top boxes to all of their subscribers.

In some cases, the triple-carriage requirement would force operators of small systems to remove existing channels from their channel lineup, or reduce the amount of bandwidth available for broadband and voice services, further broadening the digital divide between urban and rural consumers. In other cases, operator would be compelled to shut down their systems altogether, removing a vital video and voice competitor in the market, and eliminating access to any broadband service for some consumers.

The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them. The Associations and their community-based members, along with the millions of subscribers they serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

Sincerely,

Robin Anderson
Marketing Manager
Dakota Central Telecommunications
630 5th Street North
Carrington, ND 58421



September 5, 2007

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Federal Communications Commission
Office of the Secretary

TO: The Honorable Commissioners of the FCC
FROM: Pat Dalbey, General Manager & Regional Vice-President, Gray Television
RE: Support for Cable TV Viewability Proposal

Dear Commissioner(s):

With the deadline for ending analog television transmissions just 18 months away, it is imperative that cable operators be ready to protect cable subscribers from losing their local station due to technical issues. Thus I am writing to encourage you to support the DTV Carriage Order that is on your agenda for September 11, 2007. Your support of the Cable Order will require Cable Operators to be prepared to accept Broadcasters Digital signals and provide them to all households on the cable system without degradation. The Cable Order also requires Cable Operator to provide "analog only" households with the necessary equipment to down convert the Broadcasters Digital signal. These two steps are necessary in order to assure that all cable households are provided service from the broadcasters in their area without interruption caused by technical issues at the cable system.

Your support of the Cable TV Viewability Proposal on September 11th is important.

Sincerely,

Pat Dalbey
General Manager & Regional Vice-President, Gray Television

PAD/jg

Transmitted by email:

Honorable Kevin J. Martin, Chairman
Honorable Michael J. Copps, Commissioner
Honorable Jonathan S. Adelstein, Commissioner
Honorable Deborah Taylor Tate, Commissioner
Honorable Robert M. McDowell, Commissioner
Marsha MacBride, Executive Vice-President, Legal & Regulatory Affairs, NAB

SEP 10 2007

Federal Communications Commission
Office of the Secretary

From: Gordon Wark [mailto:gwark@wagmtv.com]
Sent: Wednesday, September 05, 2007 11:33 AM
To: Kevin Martin; Michael Copps; Jonathan Adelstein; Deborah Tate; Robert McDowell
Cc: mmacbride@nab.org
Subject: CableTV Viewability Proposal

Chairman Martin, Commissioners Copps, Adelstein, Tate, and McDowell,

I am writing to you first to thank you for the opportunity to speak before the Commission at the public hearing held earlier this year in Portland, Maine.

Secondly I am writing to encourage you to please give serious consideration to the Cable TV Viewability Proposal on your docket for September 11, 2007.

The continued viability of local media is critical to the fabric of the local identity of our communities. What is most critical to the viability of local broadcast media is the widest dissemination possible of the broadcaster's signal. I believe that the CableTV Viewability Proposal represents a very forward thinking approach that will greatly help to: prevent the disenfranchisement of many television viewers after February 18, 2009, give the local broadcaster the ability to recover millions of dollars already spent on the transition and the upgrade to HDTV, and give the viewers the most spectacular images and sound available while expanding the number of local services available greatly.

As indicated in the information below my name and title, I manage both television and cable companies and see only a win, win for both entities.

Sincerely,

Gordon Wark
President/GM
NEPSK Inc.
WAGM-TV8 DT8-1 FOX8
DT 8-2 CBS8 HD &
Polaris Cable Services
207-764-4461
12 Brewer Road
Presque Isle, Maine 04769

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Federal Communications Commission
Office of the Secretary

From: Wyatt, Andrew [mailto:AWyatt@kswt.com]
Sent: Wednesday, September 05, 2007 2:02 PM
To: Deborah Tate
Subject: DTV Carriage Rules

Dear Commissioner Tate:

I am the General Manager of Pappas Telecasting's Station KSWT, the CBS and CW affiliates in Yuma, AZ – El Centro, CA.

I believe that it is imperative that the Commission put cable subscribers first when it adopts its DTV carriage rules next Tuesday, and am writing to express my strong support for the Commission's "viewability" proposals.

The FCC must act to ensure that cable subscribers are not disenfranchised by the switch to digital-only broadcasting in February 2009. Therefore, we support the Commission's proposal to require cable operators to choose between (a) downconverting the digital must-carry channels and

carrying both the digital and analog signals for these channels and (b) carrying the local must-carry

signals in digital only and providing the necessary equipment to ensure that all subscribers can view those

signals. The "viewability" proposal outlined above will promote Congress's goal of ensuring that the

DTV transition is completed smoothly and in a manner that benefits consumers.

We also support the Commission's pro-consumer extension of the signal degradation rules to digital carriage, and believe that the Commission's proposal in this regard will ensure that every cable customer receives the full benefits of digital television.

Many thanks for all of your efforts to ensure a smooth DTV transition for all television viewers.

Sincerely,

Andrew Wyatt

General Manager/General Sales Manager

KSWT News 13 / 13.2 the CW

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Federal Communications Commission
Office of the Secretary

From: Barresi, Vince [mailto:VBarresi@nebraska.tv]
Sent: Wednesday, September 05, 2007 2:08 PM
To: Deborah Tate
Cc: Pappas, Peter
Subject: Viewability

Dear Commissioner Tate:

I am the General Manager of Pappas Telecasting's Stations KHGI and KWNB, the ABC affiliates in Central Nebraska.

I believe that it is imperative that the Commission put cable subscribers first when it adopts its DTV Carriage

Rules next Tuesday, and am writing to express my strong support for the Commission's "viewability"

proposals.

The FCC must act to ensure that cable subscribers are not disenfranchised by the switch to digital-only broadcasting in February 2009. Therefore, we support the Commission's proposal to require cable operators to choose between (a) downconverting the digital must-carry channels and

carrying both the digital and analog signals for these channels and (b) carrying the local must-carry

signals in digital only and providing the necessary equipment to ensure that all subscribers can view those

signals. The "viewability" proposal outlined above will promote Congress's goal of ensuring that the

DTV transition is completed smoothly and in a manner that benefits consumers.

We also support the Commission's pro-consumer extension of the signal degradation rules to digital carriage, and believe that the Commission's proposal in this regard will ensure that every cable customer receives the full benefits of digital television.

Many thanks for all of your efforts to ensure a smooth DTV transition for all television viewers.

Sincerely,

Vincent F. Barresi
General Manager

From: Teresa Burgess [mailto:tburgess@kgbt4.com]
Sent: Wednesday, September 05, 2007 2:26 PM
To: Deborah Tate
Subject: Request for Support of Cable TV Viewability Proposal

September 5, 2007

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SEP 10 2007

Federal Communications Commission
Office of the Secretary

The Honorable Deborah Taylor Tate
Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Via e-mail

Honorable Commissioner Tate,

KGBT-TV is the CBS affiliate serving the Harlingen-McAllen-Brownsville market in the Rio Grande Valley of South Texas. On behalf of our viewers, I am requesting your support of the Cable TV Viewability Proposal.

This proposal would give cable operators the option of either carrying both the analog and digital signals, or carrying the solely the digital signal with the assurance that subscribers have the necessary down conversion equipment for their analog sets.

Passage of this order is imperative to protect analog subscribers from loss of service after February 17, 2009. It would also ensure that digital television signals would not suffer material degradation when carried on cable systems.

The Cable TV Viewability Proposal will guarantee that cable subscribers will not be disenfranchised after the DTV transition, and will protect our signals from material degradation so that consumers can reap the full benefits of HDTV.

Thank you in advance for your support.

Sincerely,

Teresa S. Burgess

Teresa S. Burgess
Vice President, General Manager
KGBT-TV

From: Brad Van Sluyters [mailto:bvs@wluctv6.com]
Sent: Wednesday, September 05, 2007 2:41 PM
To: Deborah Tate
Subject: Cable TV Viewability Proposal

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Federal Communications Commission
Office of the Secretary

Dear Commissioner Tate:

The intent of this e-mail is to further emphasize how important the Cable TV Viewability Proposal is to the American consumer, our viewers. In small markets, like the one that WLUC provides a signal to, every home needs to be protected from the loss of service, and that means analog as well as a digital signal. Many homes in our area will need to be able to view our analog signal. WLUC, a Barrington Broadcasting Company station, has invested huge sums of money to assure our viewers will receive a clean clear digital product. We need your support to assure our viewers that they will be protected from material degradation so that they can reap the full benefits of HDTV.

We support the Cable TV Viewability Proposal as the only way to guarantee that analog cable subscribers will not be disenfranchised after the DTV transition. Also, it is imperative that TV signals be protected from material degradation so that consumers can reap the full benefits of HDTV.

Sincerely,

Brad Van Sluyters
VP/General Manager
WLUC-TV
Marquette, MI